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12. A Transparent Digital Election Campaign? The Insights and Significance of Political Advertising Archives for Debates on Electoral Regulation

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Throughout the last decade, digital technology has become seen as increasingly important in election campaigns. Each new election has seen growing coverage of the role played by websites, social media pages and online advertising in securing electoral victory. At the 2019 General Election this narrative recurred but whilst in the past digital technology has been a supplement to offline campaigning, digital was now an integral component of electoral activity. Whether measured in terms of spending on digital campaigning, activity on online platforms, or media coverage of digital content, the online sphere was prominent as never before. Whilst recognising the new status of digital campaigning it is, however, important to note that this activity is by no means uncontentious. Indeed, this election raised numerous questions about what is and is not permissible online and how problematic practices should be curtailed. We explore what we know about digital campaigning at the 2019 General Election, presenting the first academic analysis of newly available transparency data from the Facebook and Google advertising archives. Reviewing this data, we diagnose the need to revisit existing systems of electoral regulation and oversight with a view to questions of transparency.

1. Digital campaigning in 2019

A key lesson from the 2017 General Election was the importance of digital campaigning tools. As Kreiss has argued, technology is often cited in accounting for electoral outcomes (2016, p. 15) and for the Conservatives, electoral victory was at least partially attributed to the use of

online advertising on Facebook. Labour also focused on technology as a key strength of their campaign, asserting that organic message dissemination and sharing helped to mobilise supporters and bypass traditional media outlets. As a result of these ideas, not only did Labour and the Conservatives internalise the importance of digital to future campaigns but so too did smaller parties and non-party campaign groups. Across the electoral landscape, therefore, consensus emerged around the importance of devoting resource and staffing to digital, resulting in significant investment in digital content. Indeed, levels of spending on paid for advertising, predominantly, but not exclusively on Facebook, surpassed previous levels, with spending rising from the £4.3 million reported in 2017 to around £14.5 million in 2019. In addition, campaigners invested in organic content and peer-to-peer message sharing strategies, with, for example, the Liberal Democrats recruiting 'Online Champions' to promote their messages (Liberal Democrats, 2019). This raft of digital activity was not just evident amongst party elites but was also initiated by local campaigns and non-party campaigners (Dommett,, Temple and Seyd, 2020), resulting in a range of online activities.

The growing prominence of digital campaigning is of particular interest because, in the run up to the General Election, it was widely argued that there was a need for urgent electoral reform. Indeed, the Electoral Reform Society has argued that electoral 'rules and laws have not always kept pace with the increasing use of digital campaigning' (2019, p. 17), whilst the Electoral Commission have suggested that digital campaigning raises concerns that 'our democracy may be under threat' (2018, p.1). Given these trends, we review what we know about digital campaigning at the 2019 General Election and discuss the significance of these insights for existing systems of regulatory oversight.

2. Transparency and the 2019 General Election campaign

The 2019 General Election was different in many ways from previous elections, but, in particular, it marked a new high point for transparency in digital campaigning. For those interested in the study of online campaigning there have historically been few mechanisms by which it is possible to ascertain what is happening online. Although the Electoral Commission compels all parties and non-party campaigners (in the latter case spending above a certain threshold) to register with the Commission and complete spending returns, these requirements do not apply to all campaigners and do not result in detailed insight into digital campaigning activity (Dommett and Power, 2019).[1] This means there is little official data about who is conducting digital campaigning and what they are doing, with only patchy insights about paid-for content such as online advertising or sponsored content, and no official data on organic campaign material such as posts or memes made and shared by supporters or campaigns without payment (Fulgoni, 2015). Other means of monitoring campaign content have also been very limited, as the nature of social media means that content is often disseminated in closed groups or private messaging services (such as WhatsApp) and cannot be seen by those wishing to study a campaign. Targeted advertising, for example, is not visible to all users, but is only seen by those an advertiser wants to reach (Chester and Montgomery, 2017). This has meant that journalists, researchers and others have had few means by which to gather data about what is happening online – with only a small number of platforms providing access to data for researchers (Møller and Bechmann, 2019).

Ahead of the 2019 General Election, however, researchers, journalists and users were given access to new forms of data. Following extensive criticism,[2] major companies, including Facebook and Google, took steps to increase transparency on their platforms (Leerssen et al,

[1] The threshold for registering as a non-party campaigner are high – with only those spending over £20,000 in England and £10,000 in the rest of the UK needing to register. Spending returns also do not currently disaggregate spending about online campaign activities.

[2] Criticisms have been particularly prominent since 2016 and the Cambridge Analytica Scandal.

2019, p.2). These changes were designed to shine 'a bright light on all ads, as well as the Pages that run them' making 'it easier to root out abuse – helping to ensure that bad actors are held accountable for the ads they run' (Facebook, 2018). In the context of election campaigns, this led to more information being disclosed to users, civil society and government through (amongst other measures) the creation of online advertising archives. These resources provide more information about the *advertising* content that appears in elections and can be used to highlight trends in digital campaigning activities. However, these are voluntary initiatives and so have not been provided by all online platforms, meaning there are many areas of the web where we have no understanding of how advertising is being used. Nevertheless, these innovations by Facebook and Google provide a window into two major sites of online advertising and hence provide a valuable resource for those seeking to understand this practice at elections. Accordingly, in the analysis below, we present the first detailed academic analysis of UK political advertising data released by Facebook and Google's advertising archives.

In offering this overview, it is important to state that these archives are varied in form (CITA, 2020) and have been criticised for deficiencies in scope and functionality (Mozilla, 2019). Indeed, researchers and journalists have highlighted concerns including technical issues that led adverts to disappear from the archives (Scott, 2019), evidence of advert spend underreporting (Hern and McIntyre, 2019) and a lack of precision in the data provided (such as lack of data on electoral constituencies and targeting parameters) (Leerssen et al., 2019, p.12). These archives therefore represent a significant advance in transparency around digital election campaigning, but they are by no means perfect.

In addition, it is also important to acknowledge that these archives focus upon only one kind of digital campaigning content. Campaigns also use other kinds of paid content beyond advertising (such as paying influencers or to boost organic posts) and they also rely on public

posts and organic content to disseminate their messages and ideas. Whilst some tools exist to provide insights into this kind of content (for example, CrowdTangle, a tool that collects data on social media sharing on Facebook, Instagram and Reddit) there is no way to systematically gather data about activity in closed or private spaces such as Facebook Messenger or WhatsApp groups. This means a significant realm of online activity is not being scrutinised, so we know little about whether campaigning occurs in these spaces, and whether it accords with electoral rules. Whilst some scholars and journalists have made attempts to study private groups (for example, van Duyn, 2018), resource issues mean that scope is often limited, and ethical concerns limit the ability to gather data covertly (meaning that the dynamics of a group can change when a researcher is present). For these reasons, there are significant areas of digital campaign activity that we know little about, and many others where our insights are limited or imprecise. Acknowledging these limitations, we turn to review what we are able to ascertain from the newly created advertising archives.

3. Advertising archives: What do they reveal?

The data reported below was gathered from the Facebook and Google archives, using each platform's Application Programming Interface (API). It was collected between 6 November and 19 December 2019 as part of a collaborative project conducted at the University of Sheffield.[3] Reviewing this data, we consider what we know about four aspects of the digital advertising campaign:

[3] In obtaining this data, it is important to note that the Facebook API does not provide information only about those advertising about the election, rather data is provided for all advertisers who are classified as placing a social and political advert between 6th November and 19th December. This makes it necessary to develop inclusion criteria to determine which adverts are most likely to be related to the election. To do this, we created a list of all advertisers who spent at least £1,000 and a second list that included the advertiser whose name contains one of the keywords from (i) a party name or its abbreviated name, (ii) a candidate name, (iii) or one of keywords 'party, vote, candidate, election, Brexit'. We then merged the lists, resulting in a sample of 2,693. Reviewing this data, we identified 1,217 entries that did not spend over the £1,000 threshold AND did not contain one of our key words. This left 1,476 entries. These were then manually labelled to indicate whether it was affiliated with a party, or whether they were a non-party actor. This process allowed us to remove a number of false positives from the data, but it is important to note that some of the 1,217 we did not label may relate to the election. The analysis we

1. Platform use
2. Party spending
3. Party advertisers
4. Non-party advertisers

Platform use

Looking at the headline figures gathered from each archive (Table 12.1) it is clear that both platforms were extensively used during the General Election and that significant resource was being spent on both Facebook and Google advertising. Comparing the numbers reported here to official spending returns made at previous elections, there appears to have been a marked increase in funding devoted to digital. Whilst returns to the Electoral Commission do not fully disaggregate digital spending, their figures suggest that at the 2017 General Election £4.3 million was spent on digital advertising, with about £3.16 million spent on Facebook (Dommett and Power, 2019). The suggestion that £11.5 million was spent on Facebook alone (Table 12.1) therefore indicates a significant rise. Yet, as the spending figures reported in Table 12.1 make clear, the figures available from each companies' advertising archive are not precise. Instead of giving a specific figure, Facebook and Google provide information about advertising spend in brackets (i.e. <£100, £100-£199 etc) with each company using different bracket ranges to present their data. This means that it is only possible to report minimum, maximum and average spend, with the latter referring to the median amount between the minimum and maximum provided for each individual advert. This approach is far from ideal, as the variance between minimum and maximum is significant (ranging from just over £650,000 for minimum spend

therefore offer reflects specific coding and exclusion choices and should be viewed accordingly. It should be noted that data from Google did not require such extensive filtering because of the scope of their archive, however we did apply these criteria and identified one entry that did not fit our criteria.

and £5.2 million for maximum possible spend on Google), making it unclear precisely how much resource was devoted to advertising on these platforms.

Table 12.1 Facebook and Google Political Advertising and Expenditure Activity by Party and Non-party Advertisers between November 6th and December 19th 2019, 2019 General Election

Platform	Number of Advertisers[4]	Number of Adverts	Minimum Spend	Maximum Spend	Average Spend
Facebook	1,476	79,729	£7,064,500	£16,024,771	£11,544,636
Google	12	681	£665,100	£5,245,650	£2,955,375
Total	1,488	80,410	£7,729,600	£21,270,421	£14,500,011

It is also challenging to draw simple conclusions from this data about the focus of advertising activity online. It may initially appear that Facebook was the most popular advertising platform, as the amount reported there appears significantly higher than on Google. It may also appear that more people were running adverts on Facebook than Google (as 1,476 advertisers were active on Facebook, whilst just 12 were active on Google) and that more adverts were placed on the former platform. And yet, it is important to be cautious when inferring insights from these figures. Facebook and Google have different criteria for what counts as a political advert and these differences account for at least some of the variation seen in each archive report. Facebook has an expansive definition that includes adverts '[m]ade by, on behalf of or about a current or former candidate for public office, a political figure, a political party or advocates for the outcome of an election to public office', that are '[a]bout any election, referendum or ballot initiative, including "go out and vote" or election campaigns; or [a]bout social issues in any place where the ad is being placed; or [r]egulated as political advertising' (Facebook, no date, a). In contrast, Google limits its definition of 'political' to adverts that reference 'political organisations, political parties, political issue advocacy or fundraising, and

[4] See footnote 3 for explanation of inclusion criteria used to generate these figures.

individual candidates and politicians' (Google, no date). This means that fewer adverts and advertisers are captured by the Google archive and that data is accordingly not directly comparable. Whilst it therefore appears that more money was expended on Facebook and that more advertisers and adverts were on this platform it may be that similar content was placed on Google that has simply not been reported in the archive. This makes it challenging to draw clear insights from the data about relative platform use, showing the difficulties that emerge when data is not reported in a consistent way.

Party spending

Turning to look in more detail at the spend on advertising, it is possible to draw some more illustrative conclusions. Digging further into the headline figures, we can look at the amounts being spent by different parties on each platform. Shown in Table 12.2, we can see that Labour reported the largest spend on Facebook, reporting an average spend of just over £2 million. This was largely comparable with the Conservatives (at £1.5 million), but dwarfed the amount spent by smaller parties, with the Brexit Party spending, £681,138, the Greens £142,943 and UKIP just £744. It is also interesting to note that the distribution of party spending across platforms varied. So, whilst Labour focused more on Facebook, the Conservatives concentrated equally on both platforms (spending around £1.5 million on both platforms). There accordingly appear to be interesting differences in which platforms were used by political parties, and how extensively.

Table 12.2 Facebook and Google Political Advertising and Expenditure Activity by Parties between November 6th and December 19th 2019, 2019 General Election

Platform	Party Affiliation	Number of Advertisers	Number of Adverts	Average Impression	Average Spend
	Labour	367	9,018	144,213,503	£2,074,391
	Conservatives	300	13,759	89,813,123	£1,523,921
	Liberal Democrats	243	14,204	92,553,402	£1,356,298
	Brexit Party	77	4,824	26,845,588	£681,138
	Green Party	75	1,114	10,462,443	£142,943
	Other Party	57	2,153	8,409,424	£140,174
	Scottish National Party	31	288	6,535,856	£51,956
	Independents	47	457	2,314,772	£34,622
	Plaid Cymru	19	139	2,243,931	£19,581
	UKIP	3	13	42,494	£744
Facebook	**Total**	**1,219**	**45,969**	**383,434,533**	**£6,025,766**
	Conservatives	2	298	107,279,852	£1,766,075
	Labour	2	114	60,934,943	£739,675
	Liberal Democrats	3	185	16,684,908	£242,950
	Brexit Party	1	7	8,304,997	£188,525
	Independents	1	28	1,679,986	£14,675
	Other	2	22	2,489,989	£1,800
Google	**Total**	**11**	**654**	**197,374,674**	**£2,953,700**

This data can also be used to calculate the proportion of parties' total campaigning budget that is being spent on online adverts on these platforms. Whilst the limits of spending are nuanced, and official returns have not yet been made, we know that the spending limit for a political party standing candidates in each of the 650 UK constituencies is £19.5 million (BBC, 2019). Whilst parties rarely meet this spending limit, we can use this figure to get an idea of what proportion of possible spend is going on digital advertising. Taking Labour figures, for example, if we sum average spend data from Google and Facebook, we can see that £2,814,066 was spent on online adverts. This constitutes 14% of the total *possible* spend. In comparison, the Conservatives' average spend amounts to £3,289,996, a figure that represents 17% of possible expenditure. These figures are far vaster than smaller parties, with the Brexit Party's £869,663 constituting 4% of their possible total budget. These are large proportions of party spend, especially given that these figures are likely to underestimate the total proportion spent as, even drawing on average spend data which may not equate to actual spend, we know that few parties (and especially smaller parties), meet imposed spending limits.

We can also use this data to gain an impression of how much was being spent on individual adverts. By dividing the total average spend figure by the number of adverts, we can see how advert spend varied. Beginning with the figures for all types of campaigner, we can see that the average expenditure totalled £131 for a Facebook advert, whilst for Google it was £4,516. This explanation for this difference is unclear, but it may reflect the lack of small, low spending advertisers on Google (with spend on this platform made by national parties aiming to reach larger audiences). Looking in more detail at how the spend of parties varied, we can see that Labour spent on average £230 for each advert on Facebook, the Conservatives spent £110, the Liberal Democrats £95 and the Brexit Party £141. On Google, in contrast, Labour's average spend was £6,488, the Conservatives £5,926, the Liberal Democrats £1,313 and the

Brexit Party £26,932. As such, it appears that spending on each Google advert was on average higher than for a Facebook advert.[5]

This data therefore indicates that parties were using online advertising differently. Whilst in general more was being spent online than in the past, it appears that Labour used Facebook more extensively than Google, at an average lower advert cost, and that the Conservatives spent similar amounts on the platforms, but paid significantly more per advert on Google. Interestingly, despite being a much smaller party, the Liberal Democrats invested heavily in Facebook, spending over a million pounds on the platform, whilst the newly created Brexit Party spent over £680,000. The amounts spent by other parties reflect their focus (i.e. Scotland or Wales) or smaller infrastructure. Only a tiny amount was spent by UKIP – with just £744 spent on Facebook. It is therefore clear that parties are using online advertising platforms to different degrees.

Party advertisers

In addition to insights on party spending, the data provided by Facebook (which reports data from different types of advertisers to Google) reveals two interesting things about *who* is campaigning. The first relates to the architecture of *parties'* digital campaigns, whilst the second reveals something about the presence of *non-party campaigners*. Each issue is discussed separately in this section and the next.

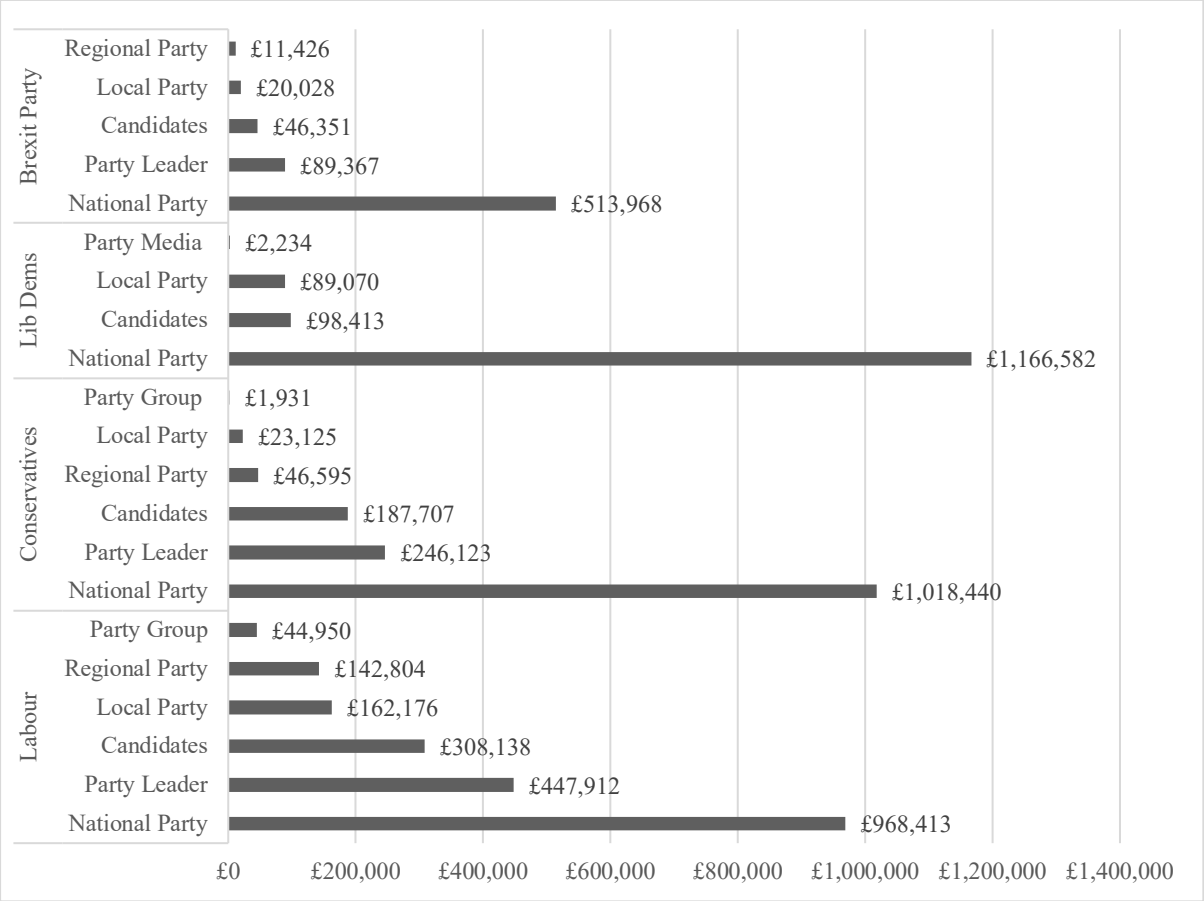
First, Facebook data shows that it is not only national parties who are placing adverts. In addition to national parties and party leaders, local candidates, parties and groups also create content and advertise online. In the Facebook archive, the data from these different actors is not aggregated, but by hand-coding data to identify party affiliations, we determined how many advertisers are affiliated to each party.

[5] It should be noted that this data could be skewed by a particularly large spend on one or two adverts.

Table 12.2 shows that each party has different numbers of advertisers. These differences reflect what we know about parties' non-digital infrastructure. The Labour and Conservative parties have a history of local party organisation which is reflected in the presence of 367 advertisers for Labour and 300 Conservative advertisers (many of whom are local candidates, parties or even groups). In contrast, the Brexit Party, who as a new party had no established grassroots organisation, had only 77 advertisers. These figures are interesting as in a truly digital campaign, we might expect each of the 650 Parliamentary seats contested at the election to exhibit local party or candidate accounts, meaning that each party would have over 650 separate advertisers but this is not the case. Indeed, even in Labour, the party with most advertisers, only around half of constituencies have local advertising presence (when removing national figures and other groups). As such there is significant potential for the local use of digital advertising to expand.

Looking in more detail at the differences, it is interesting to look at the four parties spending most on Facebook advertising. Distinguishing between the national party, party leader, candidates, regional parties (i.e. Scottish and Welsh branches of a national party), local parties, party groups and party media, it is possible to see the proportion of different actors placing adverts in each party. Figure 12.1 shows variations in the type of actor within each party responsible for fielding adverts. This shows that the national party was responsible for the vast majority of adverts in the Liberal Democrat and Conservative cases but this was not the case within Labour, where candidates were dominant. What is also interesting is the role played by party leaders. Boris Johnson's account was the most prominent of the party leaders', placing 1,254 adverts. In contrast, Jeremy Corbyn's and Nigel Farage's accounts were used to field just under 800 adverts. What is particularly notable, however, is that Jo Swinson's account was not used to place any adverts, showing a markedly different strategy to other parties.

Figure 12.1 Advertisers within Parties Placing Political Adverts on Facebook between November 6th and December 19th 2019, 2019 General Election [6]



Note: The relative size of each block in this graph relates to the number of that type of actor placing adverts within each party

When looking in detail at the amount spent by each of these actors, further variations emerge. Figure 12.2 shows that whilst placing very different numbers of adverts, national Labour and Conservative accounts spent almost equal sums (with Labour spending indicating an average of £968,413 and the Conservatives £1,018,440).

[6] Abbreviations here are: LP = Local Party, RP = Regional Party, G= Party Group

Figure 13.2 Advertising spend by advertisers within parties between November 6th and December 19th 2019 , 2019 General Election

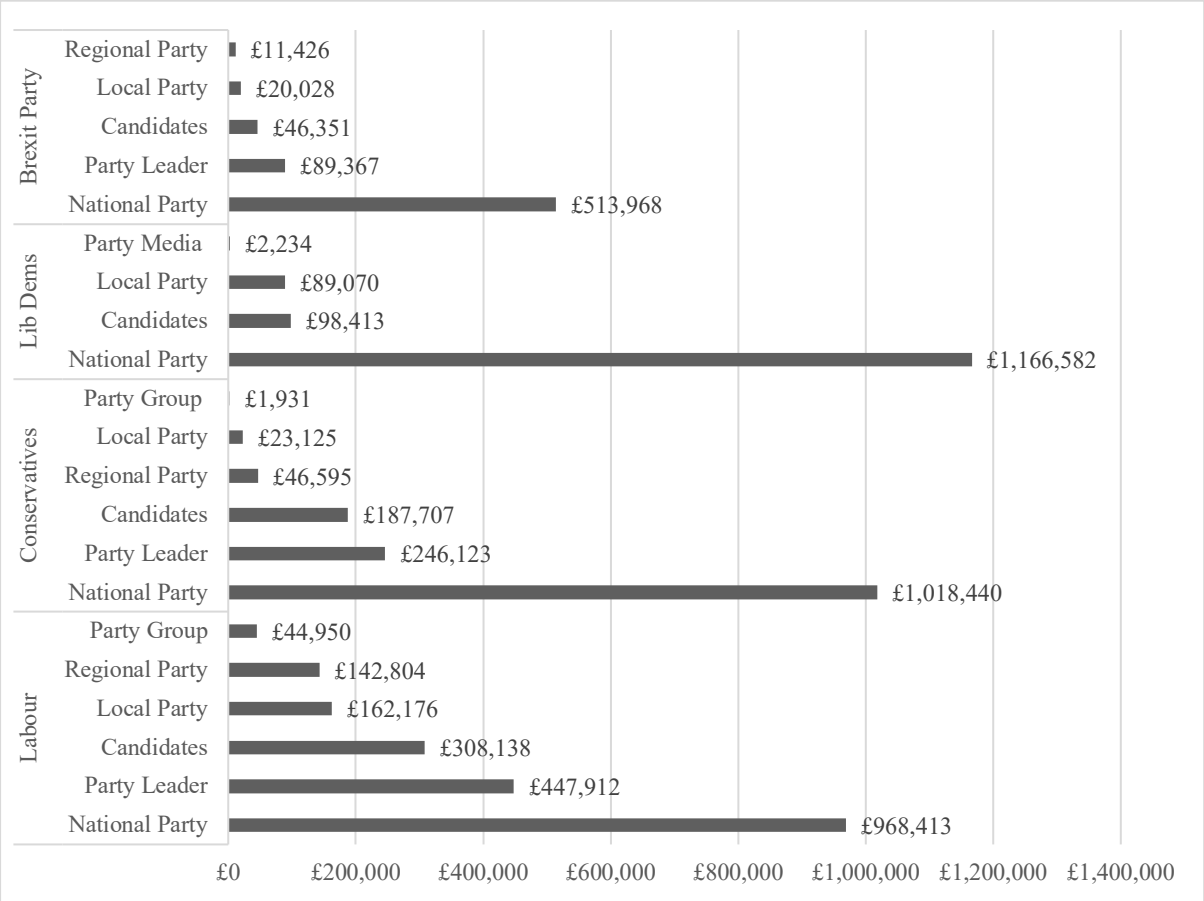


Figure 13.2 also shows that significant sums were paid by the leader, candidates, regional and local parties within Labour, with these actors collectively spending more than equivalent actors in other parties. These figures therefore reveal important insights about how parties use political advertising that were hitherto not evident within official election spending returns or in existing reporting on the Facebook advertising archive.

Non-party advertisers

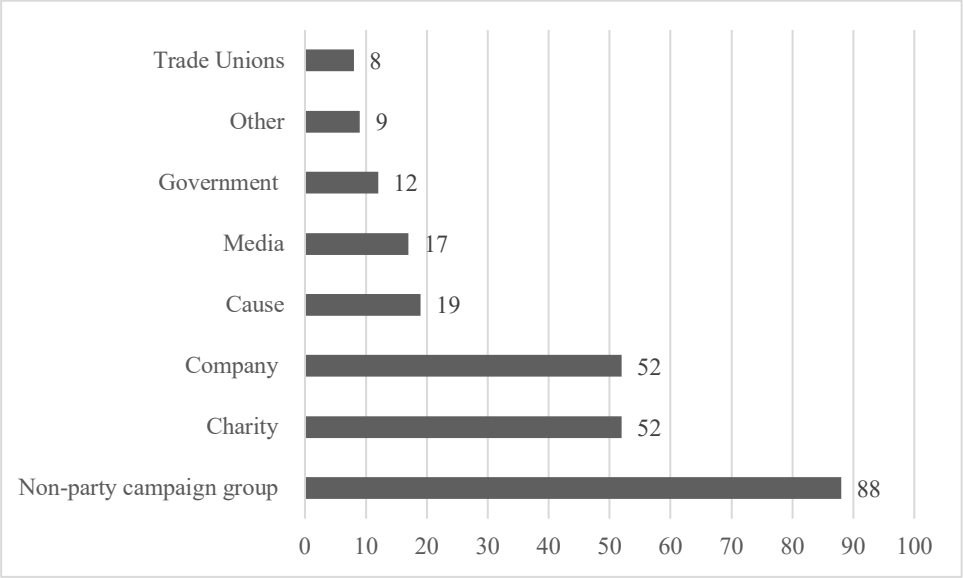
So far analysis has focused on parties, but it is also possible to identify a number of other actors who were placing adverts during the election campaign. We coded seven types of non-party actor:

- Companies
- Charities or non-governmental organisations that did not have an explicit electoral focus (such as Greenpeace or Amnesty International)
- Non-party, electorally focused campaign groups (such as Britain's Future or 3rd Party Ltd)
- Trade unions (such as the GMB)
- Media or news outlets (such as The Independent)
- Governmental accounts (such as the Mayor of London's official account), and
- Other accounts (such as universities or international political parties).

To get a sense of scale, looking at the data on advertisers from Facebook in its entirety we identified 1,219 connected to political parties and coded 257 as belonging to one of the seven types of organisation listed above. Whilst party accounts show a cumulative spend of £6,025,766 on Facebook, these non-party groups spent £5,518,870,[7] suggesting that these actors play a significant role in campaigns.

[7] Reporting average spend data.

Figure 13.3 Different Types of Non-party Advertiser on Facebook and Google, by number, between November 6th and December 19th 2019, 2019 General Election



Looking at Figure 12.3 it appears that there were several non-party campaign groups placing adverts at the election. These are groups that promote an explicit electoral message or candidate but which may or may not be affiliated to parties. Specific examples here include 'Led by Donkeys', '3rd Party Ltd', 'Campaign Together' and 'Rage against the Brexit Machine'. As evident from these examples, many non-party campaign groups were focused on Brexit, with a number of local or regional groups explicitly focused on campaigning to promote candidates with favoured Brexit views. Other advertisers classified under this heading focused on providing voter advice. For example, 'Vote Smart' and 'Vote for Policies' offered information on candidate positions and tactical voting.

Journalistic coverage highlighted examples of non-party groups that appeared designed to mislead voters about the identity of the advertiser. Investigating the activities of 3rd Party Ltd, for example, Gian Volpicelli (2019), a journalist at *Wired*, reported that the group was created by an ex-Vote Leave staffer and was '"pretending" to be the Green Party by buying Facebook ads encouraging people to vote for the Greens'. Elsewhere Rory Cellan-Jones (2019)

at the BBC reported that the 'Fair Tax Campaign' was started by a former Boris Johnson aide, and that 'Parents' Choice' was the creation of a former Conservative Minister. These examples suggest that non-party campaign groups were being used at the election to promote partisan messages without explicit party branding. Whilst examples of this behaviour were not extensive, the presence of such groups raises questions about the activity of non-party campaign groups and has led to calls (discussed further below) for increased transparency.

These calls have been particularly prominent because of the amounts being spent by these groups. As shown in Table 12.3, non-party campaign groups spent nearly £3 million during this period, suggesting that these organisations are an important medium for electoral activity.

Table 12.3 Types of non-party advertiser on Facebook and Google, 2019 General Election

Type of advertiser	Number of advertisers	Number of adverts	Average spend
Non-party campaign group	88	13,197	£2,711,452
Charity	52	14,331	£1,744,735
Company	52	2,508	£429,646
Cause	19	2,238	£227,981
Media	17	443	£135,828
Government	12	186	£128,457
Other	9	180	£13,610
Trade Unions	8	677	£127,161

Looking beyond non-party campaign groups, different kinds of advertiser can be identified, including charities and companies. However, it is important to be cautious about drawing conclusions from this data. Because Facebook's advertising archive includes non-political adverts as well as political content, it is necessary for researchers to determine frameworks for identifying political content (see footnote 3). For our analysis, we used inclusion criteria to identify advertisers whose name contained references to parties, candidates or a list of key words such as vote, election, Brexit. This allowed us to identify those adverts

placed in this period most likely to be related to the election. Taking this approach our analysis highlighted examples of companies including 'The Radical Tea Towel Company', 'Brexit: The Board Game of Second Chances', 'Brexit Bear' and 'Brexit Cereals' that were selling products related to the election and its themes. However, as with any coding framework, this approach led us to include some false positives within our data set. Our list therefore included 'Ben and Jerry's', 'Unilever', 'Coca-Cola', and 'Patagonia'. Rather than excluding these cases from our analysis, we have retained these within our database in order to show the challenges of defining (and studying) political advertising.

4. Implications for existing regulation

Online advertising archives represent a significant advance in our ability to understand digital campaigning activity. Whilst, as suggested at the outset, this source captures only a fraction of the campaign (as archives don't cover organic campaign material or other forms of paid content), they do highlight certain practices and dynamics that are of interest to observers of electoral politics. At the most basic level, they reveal important differences in campaign strategy and capacity amongst different actors. Whilst headline figures show a general increase in spending, this analysis reveals that different actors were placing different numbers of adverts at different costs during the election. In addition, it shows that parties are not the only actors using advertising, with non-party campaigners, charities, cause groups and companies also creating advertising content in the election period. These insights are extremely valuable for our understanding of digital campaigning, especially given the lack of data researchers and journalists have historically obtained. Yet, in outlining the insights to be gained from these advertising archives, this analysis also raises questions about existing systems of regulation and oversight, specifically with regards to transparency. This point is significant in light of growing calls for increased regulation of digital campaign activity (APPG for Electoral

Campaigning Transparency, 2020; Electoral Reform Society, 2019) and suggests that there is an urgent case to revisit existing systems and laws.

When it comes to transparency, the two archives have offered a range of new insights, and yet it is also clear that the data provided by these two companies is far from perfect. Not only are there issues with the imprecision of spend data, there are also concerns about data quality and reliability that make it difficult to know whether these archives are providing an accurate picture of campaigning activity. Indeed, within our own analysis, we found instances of adverts being removed from the archive with no explanation, making it unclear to what extent this data provides an accurate and consistent overview of which adverts were fielded in the campaign. Moreover, our analysis has focused just on Facebook and Google but there are many other platforms on which political adverts can be placed. Whilst some platforms have also provided information (often not in forms consistent with Facebook or Google) many other do not, resulting in significant gaps in our understanding of the extent of political advertising around elections.

This point is particularly important given recent calls for more standardised and extensive provision of online advertising archives (Electoral Commission, 2018). The Centre for Data Ethics has contended that archives should be more widely available and should contain standardised data about the 'content', 'financial transparency', 'intended audience' and 'impact' of an advert in ways that 'should be easy to analyse' (2020, p.109). Our analysis supports the case for such regulation, but it also suggests that official election returns could also be supplemented to provide addition data against which to verify information provided by platforms. The Electoral Commission has already called for campaigners to 'sub-divide their spending returns into different types of spending…[to] give more information about the money spent on digital campaigns' and asserted that '[c]ampaigners should be required to provide

more detailed and meaningful invoices from their digital suppliers to improve transparency' (2018, p.3). These changes would provide valuable means by which to gain further insight into political advertising, but also other forms of online activity – expanding our understanding beyond this specific form of online activity. As such, the new levels of transparency provided by Facebook and Google's archives illustrate how much we still do not know, suggesting the need for regulatory oversight systems that provide more information about digital campaigning activities.

5. Conclusion

This chapter has explored what we know about the digital election campaign at the 2019 General Election by looking at online advertising archives provided by Facebook and Google. It has shown that digital campaigning has become an integral part of election campaigning and revealed a significant increase in spending on these platforms. Delving into data on who is campaigning, we have shown that parties deployed different strategies that reflected a preference for different platforms, and the existence of different organisational structures. It has also shown that non-party campaigners are playing an important role in campaigns.

Reflecting on what this data reveals, we argue that there is an urgent need to think about the regulatory implications of these insights. In particular, this analysis reveals the need for more transparency, and for greater consistency in the data that is made available for analysis. Whilst these archives provide new information, there is much that we still do not know. We have data from just two advertising companies, and there are many other platforms who are not yet disclosing information. Moreover, advertising represents only a fraction of the digital campaigning picture, revealing the need to gather new insights on other forms of paid content and organic campaigning activity. This suggests the need to pursue regulatory changes that

provide more information about the digital campaign, both from platforms and systems of government oversight.

This analysis has therefore cast greater light on the activity of digital campaigning at the 2019 General Election, but it has also shown significant areas of ambiguity in our understanding of what is happening. Our findings therefore suggest the need for increased transparency and urgent regulatory reform, ensuring that we are better placed to monitor digital campaigning at forthcoming elections.

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